## REMARKS

In response to the Office Action dat d June 19, 2003, claims 1, 2, 13, 18 and 32 have been amended. Therefore, claims 1-34 remain in the case. Reexamination and reconsideration of the amended application are requested.

### Section 102(e) Rejections

The Office Action rejected claims 1-4, 6-21, 23, 25-27 and 31-34 under 35 U.S.C. § 102(e) as being anticipated by Geller et al. (U.S. Patent No. 5,844,554). The Office Action stated that Geller et al. disclose each and every element of the Applicants' claimed invention.

In response, the Applicants respectfully traverse these rejections based on the amendments to claims 1, 2, 13, 18 and 32 and the following legal and technical analysis.

In general, the Applicants submit that Geller et al. lack at least one feature of the Applicants' claimed invention. In particular, regarding independent claims 1, 2, 18 and 32, Geller et al. do not disclose, either explicitly or implicitly, the material claimed feature of "transmitting a request for information based on user-defined criteria from the client computer such that transmitted results are narrowed, limited and targeted to the information.

Regarding independent claim 13, Geller et al. do not disclose, either explicitly or implicitly, the material claimed feature of "using the rules to prevent a user from encountering a conflict by automatically correcting any conflicts to prevent the conflicts from being displayed during the user interaction with the pricing data, the rules for selection and combination containing all potential conflicts that may occur during the user interaction and corresponding safeguards to prevent the user from encountering and viewing a conflict during the user interaction with the pricing data.

Regarding independent claims 18 and 32, G ll r et al. do not disclose,   ith r explicitly or implicitly, the material claimed feature of "using the rules to prevent a user from encountering a conflict and to prevent a conflict from being displayed during the user interaction with the pricing data, the rules for selection and combination containing all potential conflicts that may occur during the user interaction and corresponding safeguards to prevent the user from encountering and viewing a conflict during the user interaction with the pricing data.

### Amended Independent Claim 1

Amended independent claim 1 of the Applicants' claimed invention includes a method for dynamically displaying data values on a client computer.  The method includes transmitting a request for information based on user-defined criteria from the client computer such that transmitted results are narrowed, limited and targeted to the information, and receiving transmitted results, sub-items associated with the results, and rules of enforcement of sub-item combinations in a predefined format through a communications interface in response to the request from the client.  The method further includes displaying a first set of results on a client display device and processing the results in real time using the client computer in response to user adjustment of the results and sub-item configuration on the client computer.  The method further includes preventing a user from creating and encountering sub-item conflicts using the transmitted rules of enforcement, the transmitted rules of enforcement containing all potential configurable conflicts between sub-items, and dynamically displaying the processed results on the client display device.

In the Applicants' claimed invention, a remote user first "requests information based on user defined criteria" (specification, page 17, lines 8-9;  FIG. 5).  This criteria is entered by the user and "narrows the data results" (specification, page 17, lines 9-10).  "For example, the user can request pricing information for used cars based on manufacturer, model, year, geographical location, trim, etc.  As such, the user defined criteria enables production of limited and targeted results, such as results for a particular car manufacturer, model and year, instead of all the cars mad   for a particular manufacturer" (specification,

page 17, lines 10-15).  Thus, the Applicants' claimed feature of transmitting a request for information is based on user-defined criteria and is designed to narrow the results obtained from the request such that those results are narrowed, limited and targeted.

In contrast, Geller et al. merely disclose transmitting a request for an entire configuration program (or updates) based on the need to update or install the program on a remote computer.  In particular, a "copy of the executable configuration program" is downloaded from the server by a "remote synchronization agent or client program" (Geller et al., col. 8, lines 39-50).  It should be noted, however, that the request is not based on criteria defined by a user.  Moreover, the request is not designed to narrow and limit the results obtained by the remote computer.  In fact, the purpose of the download in Geller et al. is to update or install the configuration program in its entirety.  Unlike the Applicants' claimed invention, narrowing and limiting the results obtained from the request based on user-defined criteria is neither explicitly nor implicitly disclosed by Geller et al..

The Applicants, therefore, respectfully traverse this rejection of amended independent claim 1 because Geller et al. do not disclose, either explicitly or implicitly, the material claimed feature of transmitting a request for information based on user-defined criteria from the client computer such that transmitted results are narrowed, limited and targeted to the information.  Because of this missing feature, the §102 rejection cannot stand.

Amended Independent Claim 2

Amended independent claim 2 of the Applicants' claimed invention includes a display device having rendered thereon dynamically changing results of a database query.  The display device includes a set of results, criteria associated with the set of results, and rules of enforcement of the criteria being stored as data on a server.  The data is transmitted from the server to a remote client that made a request for information based on user-defined criteria from the client computer such that the transmitted set of results is narrowed, limited and targeted to the information for display on the client.  Moreover, the data is transmitted as encoded data, and the rules of enforcement

contain all predefined known conflicts between th  associated criteria in different data fields.  The display device further includes at least one dynamic output and at least one adjustable interface option displayed on the client adapted to enable adjustment by the remote client of the associated criteria confined within the transmitted rules of enforcement for causing the dynamic output to change in real time such that potential configurable conflicts between the associated criteria are prevented.

In contrast, as stated above with regard to amended independent claim 1, Geller et al. merely disclose transmitting a request for an entire configuration program (or updates) based on the need to update or install the program on a remote computer.  The request, however, is not based on criteria defined by a user and is not designed to narrow and limit the results obtained by the remote computer.  Thus, the Applicants' claimed invention including narrowing and limiting the results obtained from the request based on user-defined criteria is neither explicitly nor implicitly disclosed by Geller et al..

The Applicants, therefore, respectfully traverse this rejection of amended independent claim 2 because Geller et al. do not disclose, either explicitly or implicitly, the material claimed feature of a set of results, criteria associated with the set of results, and rules of enforcement of the criteria being stored as data on a server, wherein the data is transmitted from the server to a remote client that made a request for information based on user-defined criteria from the client computer such that the transmitted set of results is narrowed, limited and targeted to the information for display on the client. Because of this missing feature, the §102 rejection cannot stand.

### Amended Independent Claim 13

Amended independent claim 13 of the Applicants' claimed invention includes a method for dynamically displaying pricing data on a client display device.  The method includes establishing a communications interface between a client computer and a server computer, requesting pricing data from the client to the server for at least one object, and generating pricing data with associated options and rules for selection and combination of the associated options for each object at the serv r.  The method further

includes transmitting the pricing data, associated options, and rules for s lection and combination of the associated options from the server to the client, displaying a first set of pricing results on the client display device, and providing a user interface on the client display device for user interaction with the pricing data and selection and combination of the associated options.  The method also includes using the rules to prevent a user from encountering a conflict by <u>automatically correcting</u> any <u>conflicts</u> to <u>prevent</u> the conflicts from being <u>displayed</u> during the user interaction with the pricing data, the rules for selection and combination containing all potential conflicts that may occur during the user interaction and corresponding safeguards to prevent the user from encountering and viewing a conflict during the user interaction with the pricing data.  The method also includes dynamically updating the pricing data using the client computer to process the update and displaying the pricing data on the client display device in response to user interaction with the pricing data and associated options, and rules for selection and combination.

In the Applicants' claimed invention, rules for selection and combination of the associated options for each object are used to prevent a user from encountering a conflict by automatically correcting any conflicts to prevent conflicts from being displayed. Automatic correction of any conflicts means that other options are automatically adjusted when a given option is selected by the user.  There is no disabling of an option (as in Geller et al.).  Automatic correction of conflicts means avoids user confusion typically associated with disable user interface (UI) elements, where the user is not sure why the UI elements are disabled or how to undo the action.

Automatic correction also prevents conflicts.  This prevention occurs during the user interaction with the pricing data.  In addition, the rules contain all potential conflicts that may occur during the user interaction and corresponding safeguards to prevent the user from not only encountering but also even viewing a conflict.  As an example used in the specification, "only sub-items that are applicable to a particular car make, model and year are displayed with the results" (specification, page 21, lines 20-21).  Thus, any sub-items that may lead to a conflict ar  not displayed.  In this mann r, the user cannot

ncounter a conflict because the conflicting choices are not available for selection because they are not displayed.

In contrast, Geller et al. displays a selection of choices to a user, including conflicting choices. Moreover, not only is a conflicting choice displayed, but the user is allowed to select a conflicting choice. Only _after_ the choice is displayed and selected is the user notified that the choice is a conflicting choice.

Specifically, referring to FIG. 13 of Geller et al., a combo box 1302 "shows all the various choices available" (col. 23, lines 62-63). An attempt by a user to enter the number 2 causes (or allows) the numeral 2 to be entered in the box (col. 24, lines 10-11). Note that "2" is a conflicting choice. Only _after_ the choice is made is the constraint applied and the system realizes that the choice is invalid and conflicting (col. 24, lines 10-14). The conflicting choice then is displayed in reverse video 1320 (col. 24, lines 12-14). Similarly, a text entry box 1305 allows display and selection of conflicting or invalid choices. Then, after selection, the conflicting choice is displayed in reverse video 1322 (col. 24, lines 14-16). For the radio button set shown 1307 in FIG. 13, the conflicting choices are "grayed out" 1325 (col. 24, lines 17-28). However, these conflicting choices still are displayed.

The Applicants, therefore, respectfully traverse this rejection of amended independent claim 13 because Geller et al. do not disclose, either explicitly or implicitly, the material claimed feature of using the rules to prevent a user from encountering a conflict by automatically correcting any conflicts to prevent the conflicts from being displayed during the user interaction with the pricing data, the rules for selection and combination containing all potential conflicts that may occur during the user interaction and corresponding safeguards to prevent the user from encountering and viewing a conflict during the user interaction with the pricing data. Because of this missing feature, the §102 rejection cannot stand.

Amended Independent Claim 18

Am r ded independent claim 18 of the Applicants' claimed invention includes a method for enforcing valid combinations of data using a server computer. The method includes receiving a request for information based on <u>user-defined criteria</u> from a remote computer such that transmitted results are <u>narrowed, limited and targeted</u> to the information, and transmitting results, sub-items associated with the results, and rules of enforcement of sub-item combinations in a predefined format from the server to the remote computer in response to the request. Processing of the transmitted results is performed in real time in response to a user adjustment of the transmitted results and sub-items associated with the transmitted results. The method further includes <u>preventing a user</u> of the remote computer from creating, encountering, and <u>viewing conflicts</u> between sub-items in different data fields during the user adjustment of the sub-items by using the rules of enforcement such that <u>only the sub-items applicable to the user-def ned criteria are displayed</u> on the remote computer. The rules of enforcement containing all potential configurable conflicts and predefined known conflicts between the sub-items.

In contrast, as stated above with regard to amended independent claim 1, Geller et al. merely disclose transmitting a request for an entire configuration program (or updates) based on the need to update or install the program on a remote computer. The request, however, is not based on criteria defined by a user and is not designed to narrow and limit the results obtained by the remote computer. Thus, the Applicants' claimed invention including narrowing and limiting the results obtained from the request based on user-defined criteria is neither explicitly nor implicitly disclosed by Geller et al..

As stated above with regard to amended independent claim 13, Geller et al. displays conflicting choices. Conflicting choices are displayed reverse video or in gray. However, these <u>conflicting choices still are displayed</u>. Unlike the Applicants' claimed feature of <u>preventing</u> a user of the remote computer from creating, encountering, and <u>viewing conflicts</u> between sub-items in different data fields during the user adjustment of the sub-items by using the rules of enforcement such that only the sub-items applicable to the user-defined criteria are displayed on the remote computer, Geller et al. displays and

allows a use⁻ to view conflicting choices.

The Applicants, therefore, respectfully traverse this rejection of amended independent claim 18 because Geller et al. do not disclose, either explicitly or implicitly, at least two material claimed features. Namely, Geller et al. do not disclose the Applicants' claimed feature of receiving a request for information based on user-defined criteria from a remote computer such that transmitted results are narrowed, limited and targeted to the information. Moreover, Geller et al. do not disclose the Applicants' claimed feature of preventing a user of the remote computer from creating, encountering. and viewing conflicts between sub-items in different data fields during the user adjustment of the sub-items by using the rules of enforcement such that only the sub-items applicable to the user-defined criteria are displayed on the remote computer. Because of these missing features, the §102 rejection cannot stand.

Amended Independent Claim 32

Amended independent claim 32 of the Applicants' claimed invention includes a method for dynamically displaying data values on a client computer. The method includes transmitting a request for information <u>based</u> on <u>user-defined criteria</u> from the client computer such that transmitted results are <u>narrowed, limited and targeted</u> to the information and receiving transmitted data values, sub-items associated with the data values, and rules of enforcement of sub-item combinations in a predefined format through a communications interface in response to a request from the client computer. The rules of enforcement contain all known conflicting sub-item combinations. The method further includes creating a control module on the client computer, using the control module to control the transmitted data values and process in real time user adjustment of the transmitted data values and sub-item combinations, and automatically noting the known conflicting sub-item combinations between a sub-item in a first field and another sub-items in second field using the rules of enforcement. The method also includes <u>preventing a user</u> from creating, encountering, and <u>viewing conflicts</u> between sub-item combinations during the real-time user adjustment using the noted known conflicting sub-item combinations such that <u>only the sub-items applicable to the user-</u>

defined criteria are displayed on the remote comput r.  Moreover, the method includes automatically selecting at least one additional sub-item in response to a user selecting a sub-item during the user adjustment of the transmitted data that requires selection of the at least one addition sub-item and dynamically displaying the processed data values on a client display device of the client computer.

In contrast, as note above with regard to amended independent claim 1, Geller et al. do not disclose the Applicants' claimed feature of transmitting a request for information based on user-defined criteria from the client computer such that transmitted results are narrowed, limited and targeted to the information.  Moreover, as noted above with regard to amended independent claim 13, Geller et al. do not disclose the Applicants' claimed feature of preventing a user from creating, encountering, and viewing conflicts between sub-item combinations during the real-time user adjustment using the noted known conflicting sub-item combinations such that only the sub-items applicable to the user-defined criteria are displayed on the remote computer.

In addition, Geller et al fail to disclose the Applicants' claimed feature of automatically selecting at least one additional sub-item in response to a user selecting a sub-item during the user adjustment of the transmitted data that requires selection of the at least one addition sub-item.  Referring to FIGS. 9 and 10 in the Applicants' specification, "if a particular sub-item 970, 1070 requires another sub-item 980, 1080 as a prerequisite, the prerequisite sub-item 980, 1080 will automatically be selected when the client user selects the particular sub-item 970, 1070" (specification, page 22, lines 3-6).  Although Geller et al. discuss deselecting mutually exclusive items, nowhere do Geller et al. disclose the Applicants' claimed feature of automatically selecting a prerequisite sub-item when a particular sub-item is chosen.  Because of these missing features, the §102 rejection cannot stand.

The Applicants, therefore, respectfully traverse the rejection of amended independent claims 1, 2, 13, 18 and 32 because Geller et al. do not disclose, either xplicitly or implicitly, at least three material claimed features of the Applicants'

invention. Namely, regarding claims 1, 2, 18 and 32, Gell r et al. lack the claim d feature of transmitting a request for information based on user-defined criteria from the client computer such that transmitted results are narrowed, limited and targeted to the information. Regarding claims 13, 18 and 32, Geller et al. lack the claimed feature of preventing a user from encountering a conflict and preventing a conflict from being displayed. Regarding claim 32, Geller et al. lack the claimed feature of automatically selecting at least one additional sub-item in response to a user selecting a sub-item during the user adjustment of the transmitted data that requires selection of the at least one addition sub-item.

Because the Applicants' claimed invention includes features neither taught, disclosed nor suggested by Geller et al., the Applicants respectfully submit that the rejections of amended independent claims 1, 2, 13, 18 and 32 under 35 U.S.C. § 102(e) as being anticipated by Geller et al. have been overcome based on the amendments to claims 1, 2, 13, 18 and 32 and the arguments set forth above and below. Moreover, rejected claims 6-12, 19-21, 23, 25 and 26 depend from amended independent claim 1, rejected claims 3, 4 and 27 depend from amended independent claim 2, rejected claims 14-17 and 31 depend from amended independent claim 13, and rejected claims 33 and 34 depend from amended independent claim 32 and therefore also are novel over Geller et al. (MPEP § 2143.03). The Applicant, therefore, respectfully requests reexamination, reconsideration and withdrawal of the rejection of claims 1-4, 6-21, 23, 25-27 and 31-34 under 35 U.S.C. § 102(e) as being anticipated by Geller et al..

## Section 103(a) Rejections

The Office Action rejected claims 5, 22, 24 and 28-30 under 35 U.S.C. § 103(a) as being unpatentable over Geller et al.. The Office Action contended that Geller et al. disclose all elements of the Applicants' claimed invention except for using a warning message and interface tools that are dynamically coupled. However, the Office Notice was taken that these expected features are "notoriously well known in the art and would have been obvious to an artisan at the time of the invention to be included in the interface tools of Geller et al. in order to aid and visually facilitate us r interaction with a constrained

set of d cision variables."

In response, the Applicant respectfully traverses these rejections based on the amendments to claims 1 and 2 and the legal and technical analysis set forth above and below. The Applicants submit that Geller et al. are lacking at least one element of the Applicants' claimed invention. In particular, Geller et al. do not disclose, either explicitly or implicitly, the material claimed feature of transmitting a request for information <u>based on user-defined criteria</u> from the client computer such that transmitted results are <u>narrowed, limited and targeted</u> to the information.

Further, Geller et al. fail to appreciate the advantages of this claimed feature. In addition, there is no technical suggestion or motivation disclosed in Geller et al. to define this claimed feature. Thus, the Applicants submit that Geller et al. cannot make obvious the Applicants' claimed feature of transmitting a request for information based on user-defined criteria from the client computer such that transmitted results are narrowed, limited and targeted to the information.

To make a prima facie showing of obviousness, all of the claimed features of an Applicant's invention must be considered, <u>especially when they are missing from the prior art</u>. If a claimed feature is <u>not disclosed in the prior art</u> and has <u>advantages not appreciated by the prior art</u>, then no prima facie showing of obviousness has been made. The Federal Circuit Court has held that it was an error not to distinguish claims over a combination of prior art references where a material limitation in the claimed system and its purpose was not taught therein. *In re Fine,* 837 F.2d 1071, 5 USPQ2d 1596 (Fed. Cir. 1988). Moreover, as stated in the MPEP, if a prior art reference does not <u>disclose, suggest or provide any motivation</u> for at least one claimed feature of an Applicant's invention, then a prima facie case of obviousness has not been established (MPEP § 2142).

<u>Amended Independent Claims 1 and 2</u>

As discussed above, am nded independent claims 1 and 2 of th  Applicants'
claimed invention include transmitting a request for information based on user-defined
criteria from the client computer such that transmitted results are narrowed, limited and
targeted to the information.

In contrast, Geller et al. merely disclose transmitting a request for an entire
configuration program (or updates) based on the need to update or install the program on
a remote computer.  The request is not based on criteria defined by a user.   Moreover,
the request is not designed to narrow and limit the results obtained by the remote
computer.  In fact, the purpose of the download in Geller et al. is to update or install the
configuration program in its entirety.  Unlike the Applicants' claimed invention, narrowing
and limiting the results obtained from the request based on user-defined criteria is neither
explicitly nor implicitly disclosed by Geller et al..  In addition, Geller et al. fail to provide any
motivation, suggestion or desirability to modify their system to include the Applicants'
claimed feature.  Thus, absent any type of teaching, motivation or suggestion, Geller et al.
cannot render the Applicants' claimed invention obvious (MPEP § 2143.01).

Geller et al. fail to appreciate or recognize the advantages of the Applicants'
claimed feature of transmitting a request for information based on user-defined criteria
from the client computer such that transmitted results are narrowed, limited and
targeted to the information.  More specifically, the user-defined criteria narrows the data
results that are received in response to the request (specification, page 17, lines 8-10).
For example, a user can request pricing information for used cars based on
manufacturer, model, year, geographical location, trim, and so forth (specification, page
17, lines 10-12).  This allows the production of limited and targeted results
(specification, page 17, lines 12-15).  Nowhere do Geller et al. discuss or appreciate
these advantages of the Applicants' claimed feature.

The Applicants, therefore, submit that obviousness cannot be established since
Geller et al. do not teach, disclose, suggest or provide any motivation for the Applicants'
claimed feature of transmitting a request for information based on user-defined crit ria

from the client computer such that transmitted results are narrowed, limited and targeted to the information. In addition to explicitly lacking this feature, Geller et al. also fail to implicitly disclose, suggest, or provide motivation for this feature. Further, Geller et al. fail to appreciate advantages of this claimed feature.

Therefore, as set forth in *In re Fine* and MPEP § 2142, Geller et al. cannot render the Applicants' claimed invention obvious because the reference is missing at least one material feature of the Applicants' claimed invention. Consequently, because a prima facie case of obviousness cannot be established due to the lack of "some teaching, suggestion, or incentive supporting the combination", the rejection must be withdrawn. ACS Hospital Systems, Inc. v. Montefiore Hospital, 732 F.2d 1572, 1577, 221 USPQ 929, 933 (Fed. Cir. 1984); MPEP 2143.01.

Accordingly, the Applicants respectfully submit that amended independent claims 1 and 2 are patentable under 35 U.S.C. § 103(a) over Geller et al. based on the amendments to claims 1 and 2 and the legal and technical arguments set forth above and below. Moreover, claims 22 and 24 depend from amended independent claim 1 and claims 5 and 28-30 depend from amended independent claim 2 and are also nonobvious over Geller et al. (MPEP § 2143.03). The Applicants, therefore, respectfully request reexamination, reconsideration and withdrawal of the rejection of claims 5, 22, 24 and 28-30.

## Conclusion

In view of the amendments to claims 1, 2, 13, 18 and 32 and the legal and technical analysis set forth above, the Applicants submit that claims 1-34 of the subject application are in immediate condition for allowance. The Examiner, therefore, is respectfully requested to withdraw the outstanding rejections of the claims and to pass each of the claims of this application to issue.
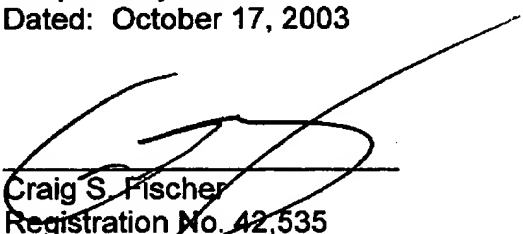
In an effort to expedite and further the prosecution of the subject application, the Applicants kindly invite the Examiner to telephone the Applicants' attorney at (805) 278-

8855 if the Examiner has any comments, questions or concerns, wishes to discuss any aspect of the prosecution of this application, or d sires any degree of clarification of this response.

Respectfully submitted,
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